

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA,

**NOTICE OF MOTION FOR  
TEMPORARY RELEASE ON BAIL**

vs.

Case No. 19-Cr-410 (KPF)

CLIFFORD TAYLOR,

Defendant.

---

**PLEASE TAKE NOTICE** that upon the annexed Memorandum of Law, attached exhibits, and all prior papers and proceedings herein, the defendant, CLIFFORD TAYLOR, will move before the Honorable Katherine Polk Failla, United States District Court Judge for the Southern District of New York, at the United States Courthouse, located at 40 Foley Square, New York, New York, as soon as possible, for an order to temporarily release Mr. Taylor on bail or to hold a bail hearing to address this motion; and granting such further relief as this Court deems just and proper.

DATED: March 16, 2020

Respectfully Submitted,

/s/

---

Florian Miedel, Esq.  
MIEDEL & MYSLIWIEC LLP  
80 Broad Street, Suite 1900  
New York, NY 10004

TO: Clerk of the Court, SDNY  
Assistant United States Attorney Daniel Wolf